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Attorney for KAMARI DAVIS

UNITED STATES DISTRICT COURT

FOR THE DISTRICT OF NEVADA

UNITED STATES OF AMERICA, Case No. 3:18-CR-00097-MMD-WGC

Plaintiff,

**STIPULATION TO EXTEND MOTION  
DEADLINES**

vs.

KAMARI DAVIS,

(SECOND REQUEST)

Defendants.

IT IS HEREBY STIPULATED AND AGREED, by and between LOREN GRAHAM, counsel for KAMARI DAVIS, NICHOLAS TRUTANICH, United States Attorney, and MEGAN RACHOW, Assistant United States Attorney, counsel for the UNITED STATES OF AMERICA, that the parties herein shall have to and including Thursday, September 5, 2019, to file any and all pretrial motions and notices of defense.

IT IS FURTHER STIPULATED AND AGREED, by and between the parties, that they shall have to and including Thursday, September 19, 2019, to file any and all responsive pleadings.

IT IS FURTHER STIPULATED AND AGREED, by and between the parties, that they shall have to and including Thursday, September 26, 2019, to file any and all replies to dispositive motions.

The Stipulation is entered into for the following reasons:

1. Counsel for the defendant needs additional time to conduct investigation in this case in order to determine whether there are any pretrial issues that must be litigated and whether the case will ultimately go to trial or be resolved through negotiations.

2. Counsel have conferred the case involves voluminous discovery.

3. Defendant KAMARI DAVIS is detained and does not oppose the extension.

4. The additional time requested herein is not sought for purposes of delay, but merely to allow counsel for the defendant sufficient time to complete necessary research, prepare and submit appropriate pretrial motions.

5. Denial of this request for extension would deny counsel for the defendant sufficient time to effectively and thoroughly prepare and submit pretrial motions and notices of defense, taking into account the exercise of due diligence.

This is the second request to extend filed herein.

DATED this 29th day of August, 2019.

/s/ Loren Graham  
LOREN GRAHAM  
Attorney for Defendant,  
KAMARI DAVIS

NICHOLAS TRUTANICH  
United States Attorney

By: /s/ Megan Rachow  
MEGAH RACHOW  
Assistant United States  
Attorney  
Counsel for GOVERNMENT

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UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF NEVADA

UNITED STATES OF AMERICA, Case No. 3:18-CR-00097-MMD-WGC

Plaintiff, **FINDINGS OF FACT AND ORDER**

vs.

KAMARI DAVIS,

Defendants.

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**FINDINGS OF FACT**

Based on the pending Stipulation of counsel, and good cause appearing therefore, the Court finds that:

1. Counsel for the defendant needs additional time to conduct investigation in this case in order to determine whether there are any pretrial issues that must be litigated and whether the case will ultimately go to trial or be resolved through negotiations.

2. Counsel have conferred the case involves voluminous discovery.

3. Defendant KAMARI DAVIS is detained and does not oppose the extension.

4. The additional time requested herein is not sought for purposes of delay, but merely to allow counsel for the defendant sufficient time to complete necessary research, prepare and

1 submit appropriate pretrial motions.

2 5. Denial of this request for extension would deny counsel  
3 for the defendant sufficient time to effectively and thoroughly  
4 prepare and submit pretrial motions and notices of defense,  
5 taking into account the exercise of due diligence.

6 This is the second request to extend filed herein.

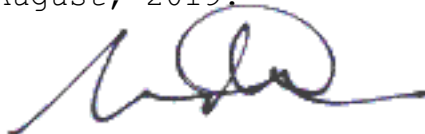
7 **ORDER**

8 IT IS THEREFORE ORDERED that the parties herein shall have  
9 to and including Thursday, September 5, 2019 to file any and all  
10 pretrial motions and notice of defense.

11 IT IS FURTHER ORDERED that the parties shall have to and  
12 including Thursday, September 19, 2019 to file any and all  
13 responses.

14 IT IS FURTHER ORDERED that the parties shall have to and  
15 including Thursday, September 26, 2019 to file any and all  
16 replies.

17 DATED this 29th day of August, 2019.

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20 MIRANDA M. DU  
21 UNITED STATES DISTRICT JUDGE  
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